

**ORIGINAL**

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Mailing Online Service

Docket No. MC98-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS CAMPANELLI TO INTERROGATORIES OF  
DAVID POPKIN  
(DBP/USPS-T8-1-5)

The United States Postal Service hereby provides the response of witness Campanelli to the following interrogatories of David Popkin: DBP/USPS-T8-1-5, filed on July 30, 1998.

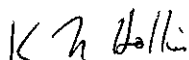
Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
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August 7, 1998



RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CAMPANELLI  
TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-1 Since you are a customer utilizing this service, what compensation, direct or indirect, if any, has the Postal Service paid you for your testimony?

RESPONSE:

None.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CAMPANELLI  
TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-2. On page 1 lines 7-8 of your testimony, you indicate that you sent out hundreds of thousands of direct mail pieces.

- (a) Over how long a period of time was that accomplished?
- (b) What was the nature of the mailing and is a similar capability available with the proposed service?
- (c) What would you estimate the total costs for these hundreds of thousand of mail pieces?
- (d) What would you estimate the total costs would be under the existing initial program?
- (e) What would you estimate the total costs would be under the proposed rates in this Docket?

RESPONSE:

- (a) The reference is to the two to three year period when I was starting out in business. I did not have an exact time in mind.
- (b) The various direct mail pieces referenced in my testimony ranged from individual coupons in mail entered by others to individual pieces that I prepared and mailed myself. With Mailing Online, that mailpiece preparation and entry are done for me after I prepare and submit the document and address list.
- (c) I do not know total costs, but per-piece their costs ranged from approximately 0.5 cents to 25 cents.
- (d) If you are asking about the current test, which is the subject of my testimony, I am limited to a maximum of 5,000 pieces per month, while paying full First-Class postage; accordingly I cannot accomplish blanket mailings using Mailing Online.
- (e) I am unable to answer this. I have no knowledge concerning what the future costs of Mailing Online service will be.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CAMPANELLI  
TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-3. On page 2 – lines 15 and 16 of your testimony, you indicate that you have never lost anything in the mail and that everything has reached its destination.

- (a) On what basis do you make this statement?
- (b) Have you contacted every recipient of every piece of mail you have ever sent to determine that it was received?
- (c) Does this also include the hundreds of thousands of direct mail pieces?
- (d) If your response to subparts (b) and (c) is not an unqualified yes, explain how you can make the original statement.

RESPONSE:

(a) - (d) Your questions quote my testimony out of context, which stated: "I have had good experiences with the Postal Service. I have done my banking through the mail, sending checks and deposits this way. I never lost anything in the mail." I do know for sure that all of my payments and deposits have reached their destination. Obviously, I cannot know whether every single direct mail piece that I sent actually arrived and I did not mean to imply as much. I do know the positive impact that those mailings have had on my business. My overall point was that I believe the Postal Service is extremely reliable, based on my own personal experience.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CAMPANELLI  
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DBP/USPS-T8-4. Why does it take you two hours to send out a mailing of 3,000 pieces while a mailing of 400 to 700 pieces only takes 20 minutes?

RESPONSE:

This question extracts statements from my testimony that, by ignoring their context, appear to set up a comparison I did not intend to make. My testimony states:

It used to take me anywhere from a day to a day and a half to send out a 3,000 piece mailing. Now, it takes me about two hours. I can prepare a small mailing of 400 to 700 pieces in 20 minutes.

USPS-T-8 at 3. The two hour estimate is comparable to "a day to a day and a half" and includes time to prepare the document being mailed, while the 20 minute estimate is for time spent online when the document was prepared in advance.

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS CAMPANELLI  
TO INTERROGATORIES OF DAVID B. POPKIN

DBP/USPS-T8-5

(a) Did you pay extra to have the Postal Service "clean" your address lists?

(b) If so, what was the charge?

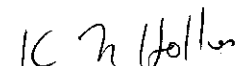
RESPONSE:

(a) - (b) No. I actually "clean" my own address lists based on feedback from Mailing

Online that tells me which addresses it will not accept.

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
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Kenneth N. Hollies

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